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Attorney for Defendant

F I L E D
 Clerk
 District Court

OCT 31 2005

For The Northern Mariana Islands
 By _____
 (Deputy Clerk)

6 IN THE DISTRICT COURT

7 FOR THE

8 NORTHERN MARIANA ISLANDS

9	ABELLANOSA, JOANNA, et. al.,)	Civil Action No. 05-0010
10	Plaintiffs,)	
11	vs.)	ANSWER TO FIRST
12	L & T INTERNATIONAL CORPORATION.)	AMENDED COMPLAINT
13	Defendant.)	Date :
14)	Time :
15)	Judge : Hon. Alex R. Munson

16 For its answer to plaintiffs' first amended complaint, defendant admits, denies, and alleges as
 17 follows:

18 1. The allegations contained in paragraph 1 are conclusions of law to which no response
 19 is required; to the extent that they may be deemed allegations of fact, they are denied.

20 2. The allegations contained in paragraph 2 are conclusions of law to which no response
 21 is required; to the extent that they may be deemed allegations of fact, they are denied.

22 3. Answering Defendant admits the allegations contained in paragraph 3 to the extent
 23 supported by the statutes cited, which are the best evidence of their contents; otherwise denies the
 24 allegations contained in paragraph 3.

25 4. The allegations contained in paragraph 4 are conclusions of law to which no response
 is required; to the extent that they may be deemed allegations of fact, they are denied.

1 5. The allegations contained in paragraph 5 are conclusions of law to which no response
2 is required; to the extent that they may be deemed allegations of fact, they are denied.

3 6. The allegations contained in paragraph 6 are conclusions of law to which no response
4 is required; to the extent that they may be deemed allegations of fact, they are denied.

5 7. The allegations contained in paragraph 7 are conclusions of law to which no response
6 is required; to the extent that they may be deemed allegations of fact, they are denied.

7 8. Answering Defendant denies each and every allegation or statement contained in
8 paragraph 8 of the Complaint.

9 9. Answering Defendant denies each and every allegation or statement contained in
9 paragraph 9 of the Complaint.

10 10. Answering Defendant admits each and every allegation or statement contained in
11 paragraph 10 of the Complaint.

12 11. Answering Defendant denies each and every allegation or statement contained in
13 paragraph 11 of the Complaint.

14 12. Answering Defendant admits that defendant was the employer of each plaintiff but
15 denies all other allegations contained in paragraph 12.

16 13. Answering Defendant admits each and every allegation or statement contained in
17 paragraph 13 of the Complaint.

18 14. Answering Defendant denies the allegations contained in paragraph 14 for lack of
19 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

20 15. Answering Defendant has insufficient information to form a belief as to the truth of
21 paragraph 15 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
22 and each of them and requires strict proof thereof.

23 16. Answering Defendant has insufficient information to form a belief as to the truth of
24 paragraph 16 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
25 and each of them and requires strict proof thereof.

1 17. Answering Defendant has insufficient information to form a belief as to the truth of
2 paragraph 17 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
3 and each of them and requires strict proof thereof.

4 18. Answering Defendant has insufficient information to form a belief as to the truth of
5 paragraph 18 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
6 and each of them and requires strict proof thereof.

7 19. Answering Defendant has insufficient information to form a belief as to the truth of
8 paragraph 19 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
9 and each of them and requires strict proof thereof.

10 20. Answering Defendant has insufficient information to form a belief as to the truth of
11 paragraph 20 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
12 and each of them and requires strict proof thereof.

13 21. Answering Defendant has insufficient information to form a belief as to the truth of
14 paragraph 21 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
15 and each of them and requires strict proof thereof.

16 22. Answering Defendant admits the allegations contained in paragraph 22 to the extent
17 supported by the documents cited, which are the best evidence of their contents; otherwise denies the
18 allegations contained in paragraph 22.

19 23. Answering Defendant denies the allegations contained in paragraph 23 for lack of
20 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

21 24. Answering Defendant has insufficient information to form a belief as to the truth of
22 paragraph 24 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
23 and each of them and requires strict proof thereof.

24 25. Answering Defendant has insufficient information to form a belief as to the truth of
25 paragraph 25 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
and each of them and requires strict proof thereof.

1 26. Answering Defendant denies the allegations contained in paragraph 26 for lack of
2 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

3 27. Answering Defendant denies the allegations contained in paragraph 27 for lack of
4 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

5 28. Answering Defendant admits each and every allegation contained in paragraph
6 number 28 of the Complaint.

7 29. Answering Defendant denies the allegations contained in paragraph 29 for lack of
8 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

9 30. Answering Defendant denies the allegations contained in paragraph 30 for lack of
10 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

11 31. Answering Defendant denies the allegations contained in paragraph 31 for lack of
12 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

13 32. Answering Defendant has insufficient information to form a belief as to the truth of
14 paragraph 32 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
15 and each of them and requires strict proof thereof.

16 33. Answering Defendant has insufficient information to form a belief as to the truth of
17 paragraph 33 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
18 and each of them and requires strict proof thereof.

19 34. Answering Defendant denies each and every allegation or statement contained in
20 paragraph 34 of the Complaint.

21 35. Answering Defendant denies each and every allegation or statement contained in
22 paragraph 35 of the Complaint.

23 36. Answering Defendant denies each and every allegation or statement contained in
24 paragraph 36 of the Complaint.

25 37. Answering Defendant denies the allegations contained in paragraph 37 for lack of
information or knowledge sufficient to form a belief as to the truth of the matters asserted.

1 38. Answering Defendant denies each and every allegation or statement contained in
2 paragraph 38 of the Complaint.

3 39. Answering Defendant denies each and every allegation contained in paragraph
4 number 39 of the Complaint.

5 40. Answering Defendant denies each and every allegation or statement contained in
6 paragraph 40 of the Complaint.

7 41. Answering Defendant denies each and every allegation or statement contained in
8 paragraph 41 of the Complaint.

9 42. Answering Defendant denies each and every allegation or statement contained in
10 paragraph 42 of the Complaint.

11 43. Answering Defendant denies each and every allegation or statement contained in
12 paragraph 43 of the Complaint.

13 44. Answering Defendant admits each and every allegation or statement contained in
14 paragraph 44 of the Complaint.

15 45. Answering Defendant admits each and every allegation or statement contained in
16 paragraph 45 of the Complaint.

17 46. Answering Defendant admits the quoted language is contained in Exhibit "7" to the
18 Amended Complaint. Except as expressly admitted, Answering Defendant denies each and every
19 allegation and statement contained in the paragraph 46.

20 47. Answering Defendant has insufficient information to form a belief as to the truth of
21 paragraph 47 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
22 and each of them and requires strict proof thereof.

23 48. Answering Defendant denies each and every allegation or statement contained in
24 paragraph 48 of the Complaint.

25 49. Answering defendant admits executing an Employer's Non-Resident Worker
Agreement but denies all other allegations in paragraph 49.

1 50. The allegations contained in paragraph 50 are conclusions of law to which no
2 response is required; to the extent that they may be deemed allegations of fact, they are denied.

3 51. The allegations contained in paragraph 51 are conclusions of law to which no
4 response is required; to the extent that they may be deemed allegations of fact, they are denied.

5 52. Answering Defendant denies the allegations contained in paragraph 52 for lack of
6 information or knowledge.

7 53. Answering Defendant admits contained in paragraph 53 that plaintiffs were given
8 termination notices as shown in Exhibit "9". Except as expressly admitted, Answering Defendant
9 each and every allegation and statement contained in the paragraph 53.

10 54. Answering Defendant admits that it terminated the plaintiffs' contract. Except as
11 expressly admitted, Answering Defendant each and every allegation and statement contained in the
12 paragraph 54.

13 55. Answering Defendant has insufficient information to form a belief as to the truth of
14 paragraph 55 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
15 and each of them and requires strict proof thereof.

16 56. Answering Defendant denies the allegations contained in paragraph 56 for lack of
17 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

18 57. Answering Defendant denies the allegations contained in paragraph 57 for lack of
19 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

20 58. Answering Defendant denies the allegations contained in paragraph 58 for lack of
21 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

22 59. Answering Defendant denies the allegations contained in paragraph 59 for lack of
23 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

24 60. Answering Defendant denies the allegations contained in paragraph 60 for lack of
25 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

1 61. In answering the allegations in paragraph 61, Answering Defendant incorporates by
2 reference each and every admission and denial contained in paragraph 1-60 of Answering
3 Defendant's answer.

4 62. The allegations contained in paragraph 62 are conclusions of law to which no
5 response is required; to the extent that they may be deemed allegations of fact, they are denied.

6 63. The allegations contained in paragraph 63 are conclusions of law to which no
7 response is required; to the extent that they may be deemed allegations of fact, they are denied.

8 64. Answering Defendant has insufficient information to form a belief as to the truth of
9 paragraph 64 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
and each of them and requires strict proof thereof.

10 65. Answering Defendant denies each and every allegation or statement contained in
11 paragraph 65 of the Complaint.

12 66. Answering Defendant denies each and every allegation or statement contained in
13 paragraph 66 of the Complaint.

14 67. Answering Defendant denies each and every allegation or statement contained in
15 paragraph 67 of the Complaint.

16 68. Answering Defendant denies each and every allegation or statement contained in
17 paragraph 68 of the Complaint.

18 69. In answering the allegations in paragraph 69, Answering Defendant incorporates by
19 reference each and every admission and denial contained in paragraph 1-68 of Answering
Defendant's answer.

20 70. Answering Defendant denies each and every allegation or statement contained in
21 paragraph 70 of the Complaint.

22 71. Answering Defendant denies each and every allegation or statement contained in
23 paragraph 71 of the Complaint.

24 72. Answering Defendant denies each and every allegation or statement contained in
25 paragraph 72 of the Complaint.

1 73. In answering the allegations in paragraph 73, Answering Defendant incorporates by
2 reference each and every admission and denial contained in paragraph 1-72 of Answering
3 Defendant's answer.

4 74. Answering Defendant denies each and every allegation or statement contained in
5 paragraph 74 of the Complaint.

6 75. Answering Defendant denies each and every allegation or statement contained in
7 paragraph 75 of the Complaint.

8 76. Answering Defendant denies each and every allegation or statement contained in
9 paragraph 76 of the Complaint.

10 77. In answering the allegations in paragraph 77, Answering Defendant incorporates by
11 reference each and every admission and denial contained in paragraph 1-76 of Answering
12 Defendant's answer.

13 78. Answering Defendant admits each and every allegation or statement contained in
14 paragraph 78 of the Complaint.

15 79. Answering Defendant denies each and every allegation or statement contained in
16 paragraph 79 of the Complaint.

17 80. Answering Defendant denies each and every allegation or statement contained in
18 paragraph 80 of the Complaint.

19 81. Answering Defendant denies each and every allegation or statement contained in
20 paragraph 81 of the Complaint.

21 82. Answering Defendant has insufficient information to form a belief as to the truth of
22 paragraph 82 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
23 and each of them and requires strict proof thereof.

24 83. Answering Defendant has insufficient information to form a belief as to the truth of
25 paragraph 83 of Plaintiff's Complaint and placing its denial on that ground, denies the allegations
and each of them and requires strict proof thereof.

1 84. Answering Defendant denies each and every allegation or statement contained in
2 paragraph 84 of the Complaint.

3 85. In answering the allegations in paragraph 85, Answering Defendant incorporates by
4 reference each and every admission and denial contained in paragraph 1-84 of Answering
5 Defendant's answer.

6 86. Answering Defendant denies each and every allegation or statement contained in
7 paragraph 86 of the Complaint.

8 87. Answering Defendant denies each and every allegation or statement contained in
9 paragraph 87 of the Complaint.

10 88. Answering Defendant denies each and every allegation or statement contained in
11 paragraph 88 of the Complaint.

12 89. Answering Defendant denies each and every allegation or statement contained in
13 paragraph 89 of the Complaint.

14 90. Answering Defendant denies each and every allegation or statement contained in
15 paragraph 90 of the Complaint.

16 91. Answering Defendant denies each and every allegation or statement contained in
17 paragraph 91 of the Complaint.

18 92. In answering the allegations in paragraph 92, Answering Defendant incorporates by
19 reference each and every admission and denial contained in paragraph 1-91 of Answering
Defendant's answer.

20 93. Answering Defendant denies each and every allegation or statement contained in
21 paragraph 93 of the Complaint.

22 94. Answering Defendant denies each and every allegation or statement contained in
23 paragraph 94 of the Complaint.

24 95. Answering Defendant denies each and every allegation or statement contained in
25 paragraph 95 of the Complaint.

96. Answering Defendant denies each and every allegation or statement contained in paragraph 96 of the Complaint.

97. Answering Defendant denies each and every allegation or statement contained in paragraph 97 of the Complaint.

98. Answering Defendant denies each and every allegation or statement contained in paragraph 98 of the Complaint.

99. Answering Defendant denies each and every allegation or statement contained in paragraph 99 of the Complaint.

100. In answering the allegations in paragraph 100, Answering Defendant incorporates by reference each and every admission and denial contained in paragraph 1-99 of Answering Defendant's answer.

101. Answering Defendant admits each and every allegation or statement contained in paragraph 101 of the Complaint.

102. Answering Defendant admits each and every allegation or statement contained in paragraph 102 of the Complaint.

GENERAL DENIAL

Except for those facts expressly admitted, Answering Defendant generally denies all allegations in the Complaint. Defendant further denies that plaintiffs are entitled to the relief sought in the prayer contained on pages 28-30 of the first amended complaint or to any relief whatsoever.

AFFIRMATIVE DEFENSES

1. As a First Affirmative Defense, Plaintiff fails to state a claim upon a relief can be granted.
 2. As a Second Affirmative Defense, Plaintiff's claims are barred by Waiver.
 3. As a Third Affirmative Defense, Plaintiff's claims are barred by Estoppel.

4. As a Fourth Affirmative Defense, Plaintiff's claims are barred by Fraud
6. As a Fifth Affirmative Defense, Plaintiff's claims are barred by the Statute of Limitations.
7. As a Sixth Affirmative Defense, Plaintiff's claims are barred by Illegality.
8. As a Seventh Affirmative Defense, Plaintiff's claims are barred by Laches.
9. As an Eight Affirmative Defense, Plaintiff's claims are barred by Unclean hands.
10. As a Ninth Affirmative Defense, Plaintiff's claims are barred by Release.
11. As a Tenth Affirmative Defense, Plaintiff's claims are barred by Statute of Frauds.
12. As an Eleventh Affirmative Defense, Plaintiff's claims are limited because Plaintiff has not suffered damage or because of Plaintiff's failure to mitigate damages.

WHEREFORE, DEFENDANT PRAYS THAT:

1. Plaintiffs takes nothing by their complaint;
 2. Answering Defendant be awarded costs of this action and reasonable attorneys fees;
 3. For such further relief as the Court deems just and proper.

Dated this 31st day of October 2005


COLIN M. THOMPSON
Attorney at Law